

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MONROE LIPSEY, on behalf of  
himself and others similarly situated  
employees,

Case No: 3:17-CV-1915-D

Plaintiff,

-vs-

RETREAT CAPITAL  
MANAGEMENT, INC., D/B/A  
ALLSEC FINANCIAL SERVICES, a  
California Corporation,

Defendant.

/

**PLAINTIFF'S NOTICE OF TAKING DEPOSITION**

To: All Counsel Listed Below:

PLEASE TAKE NOTICE that on **March 14, 2018**, beginning at **1:00 p.m. (Central Standard Time)** at:

PHIPPS REPORTING  
Mockingbird Towers  
1341 W Mockingbird Lane  
Suite 600w  
Dallas, TX 75247  
Telephone: (888) 811-3408

Counsel for Plaintiff will take the deposition(s) of: **FARHAN FAROOQUI**

Upon oral examination pursuant to Federal Rules of Civil Procedure, Phipps Reporting or any other notary public or officer authorized by law to take depositions. Said deposition(s) will be taken for the purposes as are permitted under the Rules which govern the conduct of the case.

Respectfully submitted this 18<sup>th</sup> day of January, 2018.

/s/ C. RYAN MORGAN

C. Ryan Morgan, Esq.  
Florida Bar. No. 0015527  
*Pro Hac Vice*  
Morgan & Morgan, P.A.

20 N. Orange Ave., 14th Floor  
P.O. Box 4979  
Orlando, FL 32802-4979  
Telephone: (407) 420-1414  
Facsimile: (407) 245-3401  
Email: [RMorgan@forthepeople.com](mailto:RMorgan@forthepeople.com)  
Email: [CLeach@forthepeople.com](mailto:CLeach@forthepeople.com)

-and-

Andrew. R. Frisch, Esq.  
Florida Bar No. 27777  
*Pro Hac Vice forthcoming*  
Morgan & Morgan, P.A.  
600 N. Pine Island Road, Suite 400  
Plantation, FL 33324  
Telephone: (954) WORKERS  
Facsimile: (954) 327-3013  
E-mail: [AFrisch@forthepeople.com](mailto:AFrisch@forthepeople.com)

Clara H. Saafir, Esq.  
Texas Bar No. 24037414  
The Witherspoon Law Group, PLLC  
1717 McKinney Avenue, Suite 700  
Dallas, TX 75202  
Telephone: (214) 773-1133  
Facsimile: (972) 696-9982  
[sAAFIR@TWLGLAWYERS.COM](mailto:sAAFIR@TWLGLAWYERS.COM)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 18, 2018 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

**/s/ C. RYAN MORGAN**  
C. Ryan Morgan, Esq.

cc: ***Phipps Reporting***  
***Via E-mail: [info@phippsreporting.com](mailto:info@phippsreporting.com)***  
***Telephone: 1-(888)-811-3408***